

## **THE PROVISION OF SERVICE ON TRIBAL LANDS TRIBAL GOVERNMENT ENGAGEMENT OBLIGATIONS**

Tri county Telephone Association, Inc. (TCT) provides telecommunications services on a small portion of the Wind River Reservation. By far, the greatest portion of the Reservation lies south of the Owl Creek Mountains; however, a small part of the Reservation lies north of the Mountains and TCT's Hamilton Dome exchange crosses a small section of the latter northern area. Further, in 1910, the area served by TCT was opened for homesteading through issuance of land patents by the federal government further reducing the extent of Reservation land.

The remaining Native American enterprise is the Arapahoe Ranch containing ranch offices and three residences all of which are served by private line (special access) provided by CenturyLink from tribal headquarters in Fort Washakie, Wyoming. TCT provides the terminating link for the circuit.

TCT regularly conducts house-to-house surveys in the area in search of newly arrived Native American members of the Eastern Shoshone and Northern Arapahoe tribes. The intent is to provide service and to assist with the telecommunications benefits provided by the federal government through programs offered by the Federal Communications Commission. The most recent survey was conducted early in 2013 and, as with previous surveys, no Native Americans were located. As a consequence, TCT does not serve any Native Americans, except as noted above (the special access end link to the Arapahoe Ranch).

TCT takes the obligation to serve this part of the Reservation seriously and will continue surveys in the area to ensure service is offered when newly arrived Native Americans are located.

In terms of needs assessment and deployment planning, there are no Tribal community anchor institutions located in this area of the reservation. Further, there has been no requirement for feasibility and sustainability planning because TCT has placed high capacity fiber optic cable to within a very short distance of every location within the area providing high bandwidth service availability to everyone. The capability of the fiber is such that the existing level of service as well as future demand will be available to all residing or conducting business in the area.

Because Tribal Headquarters lie outside the TCT service territory and there are no anchor institutions located in the area, TCT has not needed to market enterprise services; however all employees are aware of our service obligations to Native Americans and if and when telecommunications services are needed, they are prepared to be culturally sensitive.

TCT has obtained permission from the Bureau of Indian Affairs to place cable along the road rights-of-way in the area and will continue to do so when required. The same applies to meeting all Land Use requirements and Environmental Review processes when and wherever required. TCT provides fiber service in this area and does not now nor does it plan to provide wireless service; accordingly, Facilities Siting rules do not apply.

TCT subscribes to the Department of the Interior website and to local publications to remain aware of all matters affecting tribal culture as well as events TCT can attend to remain aware of Reservation life and the culture of its Native American neighbors.

Even through the provision of service by TCT is limited, the Company is aware of its obligations and will continue its outreach to ensure compliance with all requirements and its continuing commitment to the provision of high quality telecommunication services in the area to all existing and future residents and enterprises.

The Public Notice DA 14-384 released March 20, 2014 in WC Docket No. 10-90 indicates the average local end user rate plus state regulated fees is \$20.46. Further, the Notice indicates the Wireline Competition Bureau calculated the reasonable comparability benchmark for voice services to be \$46.96. The respondent's regulated tariff rates range from \$27.31 to \$45.08; consequently, no rate exceeds the reasonable comparability benchmark. Finally, Wyoming statute requires that no consumer pays more than 130% of the Wyoming statewide average rate which is currently \$31.39; accordingly, where tariff rates exceed that amount, a discount is applied.

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**TRI COUNTY TELEPHONE ASSOCIATION INC.**

**& TCT WEST, INC. (SAC 512296)**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**